

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
v. ) NO. 04-30033-MAP  
 )  
PAUL BANNICK )

**MOTION TO CONTINUE PLEA HEARING**

Now comes the defendant and respectfully requests this Honorable Court to continue the Change of Plea presently scheduled for October 18, 2006 at 2:30 pm to another date mutually agreeable to all parties.

As grounds for this request the defendant states counsel for the Government has been involved in a lengthy trial with one of the co-defendants. The attorneys have been unable to meet and conference the matter in a meaningful way regarding a proposed plea agreement and terms and conditions of the plea.

Counsel anticipates that when the trial of the co-defendant is concluded, it will require approximately 14-21 days for the respective parties to negotiate regarding the anticipated change of plea.

Respectfully submitted,

BY: /s/ Mark G. Mastroianni  
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CERTIFICATE OF SERVICE

I, Mark G. Mastroianni, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to Assistant United States Attorney, Kevin O'Regan, United States District Court, 1550 Main Street, Springfield, MA 01103 this 17<sup>th</sup> day of October 2006.

/s/ Mark G. Mastroianni